

EXHIBIT 7

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February 20, 2020

BY EMAIL

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Chantilly, VA 20151
mmccarroll@redgravellp.com

Re: *CSX Transportation, Inc., et al v. Norfolk Southern Railway Company, et al*
Civil Action No.: 2:18-cv-00530

Dear Monica and Alan:

I write on behalf of CSX Transportation, Inc. ("CSXT"), in further response to your letter dated February 10, 2020. Specifically, with respect to the geographic search terms that NSR proposed on January 17, 2020, we have tested those terms and discussed them with our client. CSXT continues to believe that reviewing and producing custodial ESI for ports other than NIT, VIG, and PMT is not necessary or proportional to the needs of the case. However, in the spirit of cooperation, CSXT has incorporated into its review custodial ESI that hit on those terms in NSR's proposed search term strings that relate to East Coast Ports. CSXT has also incorporated into its review custodial ESI that hit on NSR's Proposed Search Terms 1 and 2, which contained no geographic limitation. A revised list of the search terms CSXT has applied to identify potentially responsive ESI in this matter is attached to this letter as **Exhibit 1**.

With best wishes, I am

Sincerely yours,



Robert W. McFarland

February 20, 2020

Page 2

RWM:kyw

Encl

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**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

CSX TRANSPORTATION, INC.,
individually and on behalf of NORFOLK
& PORTSMOUTH BELT LINE
RAILROAD COMPANY,

Plaintiff,

v.

Civil Action No. 2:18cv530

NORFOLK SOUTHERN RAILWAY
COMPANY, NORFOLK & PORTSMOUTH
BELT LINE RAILROAD COMPANY,
JERRY HALL, THOMAS HURLBUT,
PHILIP MERILLI, and CANNON MOSS,

Defendants.

**PLAINTIFF CSX TRANSPORTATION, INC.'S
UPDATED SEARCH TERM LIST**

NPBL
"1897 Operating Agreement"
"2010 Proposal"
"2018 Proposal"
Belt line*
Beltline*
Cannon AND Moss
Capacit* AND (Virginia OR Hampton Roads OR VA OR NIT OR VIG OR PMT OR Norfolk International Terminal OR Virginia International Gateway OR Portsmouth Marine Terminal)
Carolina Junct*
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China Shipping AND (Virginia OR Hampton Roads OR VA OR NIT OR VIG OR PMT OR Norfolk International Terminal OR Virginia International Gateway OR Portsmouth Marine Terminal)
CMA CGM AND (Virginia OR Hampton Roads OR VA OR NIT OR VIG OR PMT OR Norfolk International Terminal OR Virginia International Gateway OR Portsmouth Marine Terminal)
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Commonwealth Railway
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Cosco AND (Virginia OR Hampton Roads OR VA OR NIT OR VIG OR PMT OR Norfolk International Terminal OR Virginia International Gateway OR Portsmouth Marine Terminal)
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double* w/2 stack* AND (Virginia OR Hampton Roads OR VA OR NIT OR VIG OR PMT OR Norfolk International Terminal OR Virginia International Gateway OR Portsmouth Marine Terminal)
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Purdue

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short w/2 line* AND (Virginia OR Hampton Roads OR VA OR NIT OR VIG OR PMT OR Norfolk International Terminal OR Virginia International Gateway OR Portsmouth Marine Terminal)
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((lose OR lost OR forfeit*) W/5 (business OR ship* OR account* OR traffic)) w/20 (Virginia or "Hampton Roads" or VA or "Norfolk International Terminal" OR NIT or "Virginia International Gateway" OR VIG OR "Portsmouth Marine Terminal" OR PMT)
(Pric* OR Rate* OR cost* OR margin* OR fee* OR fare*) w/20 (((Virginia OR "Hampton Roads" OR VA) w/3 (port* or terminal*)) OR "Norfolk International Terminal" OR NIT OR "Virginia

International Gateway" OR VIG OR "Portsmouth Marine Terminal" OR PMT) OR ("New Orleans" OR Houston OR Gulfport OR Mobile) w/3 (port* or terminal*))
(Pric* OR Rate* OR cost* OR margin* OR fee* OR fare*) w/20 (((Virginia OR "Hampton Roads" OR VA) w/3 (port* or terminal*)) OR "Norfolk International Terminal" OR NIT OR "Virginia International Gateway" OR VIG OR "Portsmouth Marine Terminal" OR PMT) OR ("Little Ferry" OR "North Bergen" OR Kearny OR "New York" OR Newark) w/3 (port* or terminal*))
(Pric* OR Rate* OR cost* OR margin* OR fee* OR fare*) w/20 (((Virginia OR "Hampton Roads" OR VA) w/3 (port* or terminal*)) OR "Norfolk International Terminal" OR NIT OR "Virginia International Gateway" OR VIG OR "Portsmouth Marine Terminal" OR PMT) OR (Philadelphia OR Baltimore OR Wilmington OR Charleston OR Savannah OR Jacksonville OR Lauderdale OR Miami OR Everglades OR Tampa) w/3 (port* or terminal*))
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OR NIT or Virginia International Gateway OR VIG OR Portsmouth Marine Terminal OR PMT) and
(("Seagirt Marine Terminal" OR POMTOC OR "Elizabeth Marine Terminal" OR EZMT OR NYCT
OR PNCT) w/3 (port* or terminal*))